Generator

NYN 008006702

December 17, 1997

Compliance Evaluation Inspections (CEI)

Inspector: Ron Voelkel and Claudia Gutierrez, DECA-RCB (212.637-4158)

On 16 November 1996, CEI inspections were conducted of the following two sites in East Farmingdale, NY: (1) **General Mechatronics**; and (2) **WD Equities**. These facilities were inspected in response to a referral made by CERCLA (see attachment) who are concerned that VOCs may originate from these sites may influence groundwater data obtained from a Superfund site located next to General Mechatronics.

General Mechatronics Incorporated - EPA ID No. None (designated as CESQ in manifests)
55, 60, 63, and 72 Milbar Boulevard
Farmingdale, NY 11735

A pre-inspection review of RCRIS and NY Manifest data indicates that a facility called Monitor Controls (NYD002041358) of 63 Milbar Boulevard is the only facility in the area identified by the referral as possessing an EPA ID number. Monitor Controls was last inspected in 1995 (State); no manifests originated from this site during the past two years. Representing the facility was Mr. Robert Sanchez, Maintenance Coordinator (516.249.7900). The inspection consisted of an opening interview, a site tour, a review of facility documents, and a closing interview.

As a result of this inspection, it was determined that General Mechatronics is presently a Conditionally Exempt Small Quantity Generator (CESQG).

FACILITY OPERATIONS

General Mechatronics (GM) conducts CNC (Computer and Pneumatic Controls) machining of mostly aluminum (and some stainless steel and titanium) metals to produce structural components, primarily for the aerospace industry (commercial and military). Of the four buildings encompassing the facility, two are rented (72 and 63 Milbar) and two (60 and 72 Milbar) are attached to each other as a continuous structure. Also, odd numbered Milbar addresses are located across a public roadway from the even-numbered Milbar addresses. The GM manufacturer employs approximately 185 employees with two shifts. It has been in operation at this site for about 35 years and is currently in the process of expanding.

No drains were stated as being located within the buildings and no Underground Storage Tanks (USTs) or Above Ground Storage Tanks (ASTs) are located on this site. The facility is heated by gas, and its water supply is from local municipalities. No monitoring or production wells were observed.

WASTE GENERATION

GM generates the following solid wastes: 1) water-soluble oils (Hangsterfer HE2) which is used as the lubricant during metal milling processes; 2) Speedy Dry and Speedy Dry-soaked rags, used to clean any oils that may fall onto the floor (it was stated by Mr. Sanchez that a porter is employed at all times to vacuum and cleanup spills); 3) aluminum, stainless steel and titanium metal scraps, which are drummed for reclamation, and 4) trichloroethylene, generated from their vapor degreaser. Hazardous waste determination was made from MSDS, industry knowledge, and from analysis (see Document Review section). These data indicate that trichloroethylene is the only RCRA hazardous waste generated by GM. Approximately 16 gallons of this hazardous waste is generated, on average, every month.

All of these wastes are contracted by GM to Safety Kleen for management.

SITE TOUR

The facility consists of four buildings; two of these buildings (70 and 60 Milbar Blvd.) are joined and act as a single processing area; two sets of buildings are located across from each on Milbar Boulevard. The following areas were observed during the site tour:

Building 1. 70 Milbar Boulevard (rented):

a. Flush and Flow Area: location of three devices containing mineral spirits and turbine oil, and used to test certain components; fluids contained in there devices were stated not to ever be replaced or disposed of.

b. Vapor Degreaser area: location where certain components are degreased; this device contains approximately 60 gallons of trichlorethylene, and is the only source of hazardous waste stated to be generated by GM.

c. Honing Room; location where precise bore holes are made; generates metal scraps.

Other areas observed in this building included an Assembly and Inspection Area, and the Deburring Department.

Building 2. 60 Milbar Boulevard: is joined to 70 Milbar, and is the location of the Main Plant containing most of the 22 CNP milling machines (vertical and horizontal) located on the GM site. Most of the milling machines re-used the water-soluble lubricant oil in self-containing systems. However, some spills of this lubricant were observed.

The western end 60 Milbar is the location of a centrifuge used to separate and reclaim lubrication oils; unusable oil from this process are placed in 55-gallon drums which are placed in a rear lot of 60 Milbar. This drummed storage area has a canopy and an automatic fire extinguishing system which utilizes dry extinguishing material. It was observed during the inspection that three unlabeled 5-gallon containers were also located in this drummed storage area. It was stated by Mr. Sanchez that these contain automobile fluids and placed there with GM's permission, so that it would be disposed of with the wastes. It was requested that these containers be labeled.

Other areas observed during the site tour in 60 Milbar includes, three Inspection Departments, the Engineering Department, and the Tool and Cutter Grinding Department (location where specialty and custom bits and tools are made).

Building 3. 55 Milbar (located across 60 - 72 Milbar Boulevard): is a single processing room containing three CNC machines. It was stated that the roof from this building will be raised and replaced in the near future.

Building 4. 63 Milbar (rented): is the location of "conventional" (hand/manual) milling and lathe machines used for specialized projects; no lubricants are used in this building.

A separate lot located outdoors and directly west of 60 Milbar and adjacent to the Superfund site: is the location of empty drums, wooden palates, and a large canopy-covered roll off containing aluminum scraps. The drums were haphazardly place and was the source of the concern from CERCLA personnel that this may be a possible VOC source. However, these drums were observed to be empty and to have contained the lubrication oil. Mr. Sanchez stated that a contractor was recently hired by GM to manage this lot area.

Overall, the facility seems to be properly maintained, and no concerns were noted with their management of wastes from their manufacturing processes.

DOCUMENT REVIEW

Documents were available upon request. Mr. Sanchez provided all manifest data that corresponded to the disposal of trichloroethylene. Also, he provided laboratory analysis of the waste generated and the proper MSDS data. No violations were noted, all documents were properly relinquished.

CONCLUSIONS AND RECOMMENDATIONS

General Mechatronics Corp. is a machining facility which manufacturer parts for the aerospace industry. The only RCRA hazardous waste which was determined to be generated by this facility is approximately 16 gallons of Trichloroethylene. This waste is handled properly based on the information reviewed and no violations were noted as it applies to *40 CFR parts 260-268.*

It is recommended that the RCRIS database be updated to indicate the name change of this facility, and that it be listed as a CESQG.

WD Equities (now Phase II Pasta Machines, Inc.) - EPA ID No. NYD980646608
55 Verdi Street
Farmingdale, NY 11735

It was thought that the facility mentioned above was associated with General Mechatronics. However, this site is located a few miles from the Milbar Boulevard CERCLA site.

CONCLUSIONS AND RECOMMENDATIONS

Mike Wilson, owner and president, represented Phase II Pasta Machines, which conducts milling operations of aluminum and plastic to manufacture pasta making machines. There is a lubricant involved in this process, however, it is not a RCRA hazardous waste (the material is Anchor's lube and it is basically made out of soap). As a result of this inspection, no enforcement is require as it pertains to 40 CFR 260-268. The facility does not generate RCRA Hazardous Waste. Based on this information, it is recommended the RCRIS database be updated to reflect the necessary corrections.

INSPECTOR'S MULTI-MEDIA CHECKLIST

Facility Name: General Mechatronics

Facility Address: 55, 60, 63, 72 Milbar Blvd.
Farmingdale NY

Facility ID No.:

Inspector's Name: Claudia Gutierrez, Ron Voelkel

Inspector's Phone: _____ Division/Branch: DECA-RCB

Date of Inspection: 12/16/97

Form Revised 1/24/95

INSPECTORS' MULTI-MEDIA CHECKLIST

GENERAL VISUAL CUES OF POSSIBLE NONCOMPLIANCE WARRANTING FURTHER INQUIRY

1. Sloppy housekeeping or poor maintenance in work and storage areas or laboratories.

2. Stains or discoloration of soil, concrete, or floors in work areas.

3. Distressed vegetation - unhealthy, discolored, or dead.

4. Dark smoke or dust clouds, or smoke coming from other than a smoke stack.

5. Unusual odors or strong chemical smells.

6. Sheen on surface waters.

CHECK IT OUT!

1. If you see or hear something suspicious during an inspection, check it out! Ask probing questions:

   - What is it? Is it a waste product?
   - What process produced it?
   - Has it been tested?
   - Where do you normally dispose of it?
   - Do you have a permit for the disposal?
   - How long has the circumstance existed?
   - When did it begin?

2. Pay attention to the situation.

   - Note amount of pollutant that appears to be involved.
   - Note the location.
   - Take notes describing the situation, noting the source of the pollutant and its emission point.
   - Take photographs.

PROGRAM-SPECIFIC QUESTIONS

Refer to program-specific questions in Attachment A appropriate for the facility you are inspecting.

REPORTING POSSIBLE NONCOMPLIANCE

Throughout this checklist, there are YES/NO questions. If you place an answer in a field marked with an asterisk (*), this means you should promptly refer the matter to the appropriate Region II program office. After you return from your inspection, immediately let your supervisor know that you observed possible noncompliance in another program area during your inspection. The information should then be referred to the appropriate Section Chief listed on Attachment B.

ATTACHMENT A - FOLLOW-UP QUESTIONS

RCRA

If the facility has a RCRA permit or "interim status" as a treatment, storage or disposal facility (TSDF), do not complete this form but enter the facility's EPA ID number here _____.

Ask:

1. A. Has the facility determined that it generates hazardous waste? ___YES ___NO

   If NO, skip Questions 2 to 8 and go to Question 9. If YES continue:

   B. If the facility generates or transports hazardous waste, what is its EPA ID Number? _____

   [If the facility cannot produce an ID Number, *REFER*.]

2. A. Are there containers or tanks which hold hazardous waste? ___YES ___NO

   If NO, go to Question # 3. If YES, continue:

   B. Are the containers and/or tanks clearly marked with the words "Hazardous Waste," and are they marked with the accumulation start date? ___YES ___NO*

   C. Do hazardous waste storage tanks have secondary containment systems (i.e., berm, vault, double wall tank)? ___YES ___NO*

   D. Does the facility store hazardous waste in containers or tanks for longer than 90 days? ___YES* ___NO

3. Does the facility store, treat or dispose of hazardous waste in lagoons, pits, piles or landfills? ___YES* ___NO

4. Does the facility treat hazardous waste by incineration, precipitation, neutralization or other means to change the physical or chemical nature of the waste? ___YES* ___NO

5. Does the facility accept hazardous waste for treatment, storage or disposal from off-site locations (including off-site facilities owned by the same company)? ___YES* ___NO

6. Does the facility maintain copies of hazardous waste manifests on-site? ___YES ___NO*

REFER to program office if you check an answer marked with *.

RCRA, Continued

7. Are there any indications that hazardous waste storage or treatment units (i.e., containers or tanks) are poorly maintained and may cause the release of hazardous waste to the environment?
___YES* ___NO

8. Are there any indications that chemicals or wastes have been discharged to the environment through improper handling, leaks, spills, dumping or other discharges?
___YES* ___NO

9. A. Does the facility claim to generate non-hazardous process wastes (i.e., excluding office paper wastes, cafeteria wastes, etc.)?
___YES* ___NO

If NO, go to Question 10. If YES continue:

B. What type of non-hazardous wastes does the facility handle? (E.g., treatment sludges, ash, solvents, waste oils, etc.)

_____
_____
_____

C. Very briefly describe the process(es) that generate the wastes in Question 9B.

_____
_____
_____

10. Are there any indications that waste generation, handling, management or disposal practices have resulted in environmental damage or pose the threat of such damage?
___YES* ___NO

RADIATION

Ask:

1. Are any radioactive materials used or stored at this facility?
___YES ___NO

2. If YES, does the facility have a state or federal radiation license?
___YES ___NO*

REFER to program office if you check an answer marked with *.

UNDERGROUND STORAGE TANKS (UST)

Ask:

1. Does the facility have regulated USTs? ___YES ✓NO

   [A regulated UST has more than 10% of tank volume, including piping, located underground; and contains petroleum products or hazardous substances (as defined under CERCLA). Note: USTs containing fuel oil for on-site heating are exempt from UST requirements.]

If YES, ask:

2. Are the USTs registered with the State? ___YES ___NO*

3. What kind of petroleum product or hazardous substance does UST contain? _____

4. Is there any evidence of UST leakage/spillage? ___YES* ___NO

5. When was the UST installed? _____

6. All USTs must have leak detection according to the following schedule:

Installation Date	Leak Detection By December of--
Before 1965 or unknown	1989
1965 - 1969	1990
1970 - 1974	1991
1975 - 1979	1992
1980 - Dec. 1988	1993

   All USTs installed after December 1988 must currently be equipped with leak detection.

   Leak detection systems include monitoring wells (water or vapor), automatic tank gauging system, interstitial monitoring, manual tank gauging or inventory control plus tank tightness testing.

7. Is some form of leak detection in use for every UST required (based on above schedule) to have it? ___YES ___NO*

8. Are required records available on-site (e.g., documenting registration and leak detection)? ___YES ___NO*

REFER to program office if you check an answer marked with *.

AIR

Stationary Source Compliance

1. **With sun <u>BEHIND</u> you, observe:** Is opaque smoke being emitted from a smokestack, vent or opening? ___YES* ___NO

["Opaque smoke" is smoke -- <u>not steam</u> -- dark enough to obscure anything behind the plume for five minutes or more. (Steam dissipates at a given point; smoke trails off.) The sun (if not obscured by clouds) should be in a 140° arc behind the observer. **Please note whether sun was obscured; if sun was not obscured, note the relative positions of the sun, the observer and the emission point observed.**]

2. **If YES, ask:**

   A. Which process or process line is smoke coming from? (Try to be specific, <u>e.g</u>, "Boiler No. 4" or "Coating Line C").

   _____

   B. What is the cause of the smoke emission? <u>E.g</u>.--

      i. Is any air pollution control equipment out of service or turned off while production is ongoing? ___YES ___NO

      ii. **If YES:** When will it be back on line? _____

      iii. Is the facility operating under an unusual load, using different fuels, or process feed materials? ___YES ___NO

   C. Note color of smoke: _____

3. A. Has the facility added any processes or expanded any pre-existing processes in the last two years? ___YES ___NO N/A

   B. **If YES:** Did the facility obtain any state or federal air pollution permits for the expansion? ___YES ___NO*

4. A. Does the facility have any coating or printing operations? ___YES ___NO

   B. **If YES:**

      ii. Are the coatings or inks used: ____water-based or ____solvent-based?

      i. If solvent based, are all process lines controlled, or are coating formulations in use which comply with applicable limits? ___YES ___NO*

      iii. What are the principal solvents or chemical compounds used in process lines? _____ (Ask for copies of MSDS, if available.)

REFER to program office if you check an answer marked with *.

AIR, Continued

5. **Observe:** Are there strong solvent odors at the facility? ___YES ___NO

7. Does the facility emit any of the following pollutants: mercury, beryllium, lead or asbestos? ___YES* ___NO

8. A. Does the facility emit, or use in its processes, vinyl chloride or benzene? ___YES* ___NO

   B. **If YES:**

      i. From which process lines?. _____

      ii. Does the facility check for leaks on such process equipment? ___YES ___NO*

9. A. Has the facility undergone any renovations or demolitions during the last 18 months which involved the removal or disturbance of asbestos-containing materials? ___YES ___NO

   If YES:

   B. Approximately how many square feet or linear feet of asbestos-containing materials were removed? _____

   C. If the amount exceeded 260 linear feet, or 160 square feet, ***REFER*** to Air program office; and **Ask:** was EPA notified of removal? ___YES ___NO*

CFC MULTI-MEDIA CHECKLIST QUESTIONS

Motor Vehicle Air Conditioning Recovery/Recycling Compliance Program

1. A. Does the facility perform servicing for motor vehicle air conditioners? ____YES ____NO

   B. **If YES:**

      i. Does facility have Recover/Recycle or Recovery only equipment? ____YES ____NO*

Prohibition on venting

2. A. Does the facility have any air conditioning/ refrigeration equipment or industrial compressors, which their employees perform service on (i.e. maintaining, servicing, repairing, or disposing of equipment) involving the refrigerant? ____YES ____NO

   B. **If YES:**

      i. Does facility have Recovery/Recycle or Recovery only equipment? ____YES ____NO*

REFER to program office if you check an answer marked with *.

WATER

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) And PRE-TREATMENT/UNDERGROUND INJECTION CONTROL (UIC)

1. **Observe/Ask:** Does the facility dispose of any wastewater (e.g., from its manufacturing processes, wash water or other industrial wastes)? ___YES ___NO

2. **If yes:** Does the facility discharge wastewater into a--

   - receiving stream? ___YES ___NO
   - municipal sewer (sanitary or storm) system? ___YES ___NO
   - subsurface disposal system (septic system, drywell or cesspool)? ___YES ___NO

   As applicable, ascertain the name of the stream or sewer system.

3. An NPDES permit is required for discharge to a waterbody; a pretreatment permit is usually issued by the municipality authorizing the discharge to a sanitary sewer system; and a UIC permit is required for subsurface disposal. Does the facility have a permit for each discharge? ___YES ___NO*

4. Does the facility treat wastewater prior to discharge? ___YES ___NO

5. **Observe:**

   a. Is the effluent from the wastewater treatment facilities clear and free of solids? ___YES ___NO*

   b. Is equipment clean and well maintained? ___YES ___NO*

   c. Are there any unusual odors? ___YES* ___NO

6. **Ask:** Is the effluent currently in compliance with the limitations established in the permit, or the terms of an administrative or judicial compliance order? ___YES ___NO*

7. **Observe/Ask:**

   a. How are waste fluids disposed of?

   b. Does the facility have floor or storm drains? ___YES ___NO

REFER to program office if you check an answer marked with *.

NPDES and UIC, Continued

If YES:

Is there fluid in the drains? Is there evidence (staining, etc.) of fluid entering drains? Are storm drains situated so that they could receive spills from truck loading accidents, etc?

c. Does the facility operator indicate, or is there any evidence that any wastewater, or wastes/spills go into drains?
___YES* ___NO

B. STORM WATER

1. Are there catch basins, drains, culverts, ditches, etc. on the property intended to convey storm water. N/A If yes ---
a) Is the storm water conveyed to a (1) treatment facility, (2) combined sewer, (3) separate storm sewer, or (4) surface water?
_____

2. Are the storm water discharges covered by a permit or has the discharger applied for a permit? _____

3. Are materials stored outside? Yes If yes ----
a) Are materials (1) stored in sealed containers, under tarps or roofs, or (2) are they open to contact with precipitation? Yes tarps over pallets (b) Are outside material handling/storage areas clean and kept in a manner to prevent contamination of runoff? Y.

PUBLIC WATER SUPPLY

1. **Observe/Ask:** Does the facility have its own water supply (i.e., a well)? municipal ___YES ✓NO

2. **If YES:** Does the facility provide potable water for 25 or more persons? ___YES ___NO

3. **If YES:** Is the facility sampling and analyzing for contaminants in its water supply and reporting the results to the state?
___YES ___NO*

REFER to program office if you check an answer marked with *.

EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT (EPCRA)

EMERGENCY PLANNING and COMMUNITY RIGHT TO KNOW

ASK:

1. A. Does the facility have present any of the 360 "Extremely Hazardous Substances" in excess of established threshold planning quantities? ___YES ___NO

   [Threshold planning quantities are established by regulation, vary by chemical, and range from 1 lb. to 5000 lbs.]

   B. **If YES:** Was the State Emergency Response Commission (SERC) and Local Emergency Planning Committee (LEPC) notified of their presence for local planning purposes? ___YES ___NO*

2. A. Has the facility had a release of an Extremely Hazardous Substance or a CERCLA hazardous substance in excess of the Superfund reportable quantity? ___YES* ___NO

   [Reportable quantities vary by substance, ranging from 1 lb. to 5000 lbs. For the purpose of this checklist, assume 1 lb.]

   B. **If YES:** Was notification of the release provided? ___YES ___NO*

   C. **If YES:**

   i. To whom was the notification given?

   ii. Was notification oral or written?

   iii. If oral, was a written, follow-up report submitted? ___YES ___NO*

   [If facility cannot identify to whom notification was given, cannot specify whether notification was written or oral, or is not certain whether oral notification was followed by a written follow-up report, ***REFER***.]

3. A. Does the facility have on site Material Safety Data Sheets (MSDS) for all hazardous chemicals used, as required under OSHA's Hazard Communication Standard? ___YES ___NO*

   B. If any hazardous chemicals are present in excess of 10,000 lbs., or Extremely Hazardous Substances are present in excess of the threshold planning quantities, have the MSDS (or a list of MSDS), along with chemical inventory forms, been submitted to state and local emergency planning authorities and the local fire department? ___YES ___NO*

REFER to program office if you check an answer marked with *.

EPCRA, Continued

TOXIC RELEASE INVENTORY (TRI)

Ask:

1. **Does the facility have 10 or more full-time employees?** ___YES ___NO

2. **Is the facility classified under SIC codes 20 through 39?** ___YES ___NO

If the response to either 1. or 2. is "NO," no further questions are required.

3. **If both 1. and 2. are YES:**

Did the facility use more than 10,000 lbs. of a chemical during a previous calendar year (starting with 1987). ___YES ___NO

4. **If YES:**

Did the facility file a Section 313 Toxic Chemical Release Inventory Form R for the chemical? ___YES ___NO*

For more EPCRA information, call 1-800-535-0202; or the Region II program offices for EPCRA-Emergency Planning and Community Right To Know at 908-321-6194 or for EPCRA-Toxic Release Inventory at 908-906-6890.

REFER to program office if you check an answer marked with *.

TOXIC SUBSTANCES CONTROL ACT (TSCA)

Ask:

1. A. Does the facility use electrical equipment that contains polychlorinated biphenyls (PCBs) (excluding small capacitors and florescent light ballasts)? ___YES* ___NO

   B. **IF YES:**

   i. How many oil filled electrical transformers does the facility have?

   ii. How many PCB Transformers does the facility have (transformers which contain PCBs at concentrations of 500 ppm or greater)?

2. A. Does the facility have any high temperature hydraulic systems? ___YES ___NO

   B. **If YES:**

   i. Have PCBs ever been used in these systems? ___YES* ___NO

   ii. What is the current PCB concentration in these systems?

3. A. Does the facility have any oil filled heat transfer systems? ___YES ___NO

   B. **If YES:**

   i. Have PCBs ever been used in these systems? ___YES* ___NO

   ii. What is the current PCB concentration in these systems?

4. A. **OBSERVE** PCB Items (transformers, capacitors, containers) NA

   - Are any leaking? ___YES* ___NO
   - Do all have a PCB label? ___YES ___NO*

5. A. **ASK:** Does the facility have a PCB storage for disposal area? ___YES* ___NO

   B. **If YES, OBSERVE** the PCB storage area. Does it have --

   - PCBs stored for disposal in it? ___YES* ___NO
   - a roof and walls to keep out rain? ___YES ___NO*
   - a 6" high impervious containment berm? ___YES ___NO*
   - a PCB label? ___YES ___NO*
   - Is it in the 100-year flood plain? ___YES* ___NO
   - Do all items show the date "removed from service for disposal"? ___YES ___NO*

REFER to program office if you check an answer marked with *.

TSCA, Continued

6. **ASK:** Does the facility manufacture or import into the United States "new commercial chemicals" [i.e., chemicals which were not previously manufactured in or imported into the United States]?

___YES* ___NO

[Note: Specific information on such chemicals is protected by TSCA as Confidential Business Information, and should not be obtained.]

For further TSCA information, call the TSCA Assistance Office in Washington at 202-554-1404 or the Region II TSCA program office at 908-321-6759.

SPILL PREVENTION, CONTROL AND COUNTERMEASURE (SPCC)

40 CFR Part 112.1-112.7

Ask:

1. A. Does the facility store oil? ___YES ___NO

[Note: Oil is not limited to petroleum oil; for example, vegetable oil and transformer oil are regulated oils.]

B. **If YES**, does the storage capacity exceed --

i. 660 gallons in any one above-ground tank? ___YES* ___NO
ii. 1320 gallons in all above-ground tanks? ___YES* ___NO
WRONG → iii. 42,000 gallons in underground tank(s)? ___YES* ___NO

2. If the answer to any part of #1. B. was **YES**, did the facility show you a copy, or have available a Spill Prevention, Control, and Countermeasure (SPCC) Plan?

___YES ___NO*

3. Did the facility have an oil spill within the last 12 months?

___YES* ___NO

Facility Response Plan (FRP)

40 CFR Part 112

1) Does the facility have an oil storage capacity that is greater than or equal to 42,000 gallons and conduct operations that include over-water transfers of oil to or from vessels?

___ Yes* ___ No

REFER to program office if you check an answer marked with *.

2) Does the facility have an oil storage capacity greater than or equal to one million gallons?

___ Yes* X No

3) Did the facility submit a Facility Response Plan to the EPA?

___ Yes ___ No

WETLANDS

1. Observe:

   A. Are there any wet areas (i.e., marshes, swamps, bogs) on or adjacent to the site, with or without wetlands-type vegetation such as cattails, rushes, or sedges? ___YES ✓ NO

   [Sketches of several common wetlands plants are attached. Note that there need not be standing water in order for an area to be designated a federal wetland; and some wetlands have shrubs and trees present.]

   B. Are there any waterbodies or waterways on or adjacent to the site? ___YES ✓ NO

2. If answer to # 1. A or B was "YES," is there any work (clearing, filling, dredging, ditching, construction on or over the area, etc.) being conducted in these areas, or is there any evidence that such activities have occurred very recently? ___YES ___NO

3. If YES:

   A. When was the work undertaken? _____

   B. Does the facility have any permits for this work? ___YES ___NO*

4. If YES:

   A. What agency(s) issued such permits? _____ (E.g., U.S. Army Corps of Engineers; State environmental agency.)

   B. For any federal permits, what specific type of permits are they (i.e., nationwide, regional, individual)? _____

   _____

If facility is unable to provide adequate information in response to # 4., *REFER* to program office.

REFER to program office if you check an answer marked with *.

FEDERAL INSECTICIDE, FUNGICIDE AND RODENTICIDE ACT

FIFRA

If the inspection is conducted at a manufacturing facility, ask the following:

1. A. Are there any pesticides manufactured, relabeled, or repackaged at this establishment?

___ YES ___ NO

(Pesticide is (1) any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, or (2) any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant.)

B. If YES, continue:

Does the establishment have an EPA Establishment Number? (EPA EST. #)

___ YES ___ NO*

(Section 7 of FIFRA requires all establishments producing, relabeling and/or repackaging pesticides be registered with EPA.)

C. If Yes, enter the Establishment Number here _____ and continue:

D. Has the company filed the Annual Pesticide Production Report form?

___ YES ___ NO*

(Report is due on March 2 of each year for the previous year's production.)

If the inspection is conducted at a storage-distribution facility or at a retail facility, ask the following:

2. A. Are there any pesticides being held for sale, distribution, or stored at this facility (warehouse)?

___ YES ___ NO

B. If YES, continue:

Are there any restricted use pesticides stored, or held for distribution, sale at this facility?

___ YES ___ NO

C. Are there any containers leaking?

___ YES* ___ NO

D. Are pesticides stored next to strong acids, mineral acids, caustic and/or oxidizing materials?

___ YES* ___ NO

If the inspection is conducted at a site where there is a suspicion/indication that pesticides were not properly used, observe and record any visible adverse effects such as human adverse reaction(s), fish kill, dead birds, dead wildlife, plant damage, etc, and ask the following:

3. A. Have pesticides been applied by you (or by an employee of your company or by a pesticide application company?

___ YES* ___ NO

B. If YES, continue obtaining the following information:

- Date of application,
- Name of pesticide applied,
- Name of pesticide applicator company (if applicable) or person in your company who made the application,
- Address and/or phone number of pesticide applicator company (if applicable),
- Type of health complaints from employee (if applicable),
- Contact person for follow-up.

REFER to Program Office if you check an answer marked with *.

CRIMINAL ACTS

During the course of this inspection, has anything been brought to your attention which would indicate the following:

1. Is the facility involved in deliberate acts of dumping or discharging wastes?

   _____ Yes* ___✓___ No

2. Is there any evidence of bad intent or conduct? For example, falsification or records or efforts to conceal activities?

   _____ Yes* ___✓___ No

3. Has there been any actual harm to individuals as a result of violations?

   _____ Yes* _____ No

4. Other activity or behavior which you believe indicates criminal behavior?

   _____ Yes* _____ No

Refer to Criminal Investigation Division if you checked Yes.

Attachment B

REGION II MEDIA PROGRAM SECTION CHIEFS (and Alternate Contacts)

RCRA: Joel Golumbek (NJ, Caribbean), 637-4140
John Gorman (NY), 637-4150

AIR (Except Asbestos): (Including CFC) Karl Mangels (NY), 637-4078
Jehuda Menczel (NJ, Caribbean), 637-4045

AIR/ASBESTOS: Robert Fitzpatrick, 637-4042

UST: Dit Fai Cheung, 637-4124

TSCA: Dan Kraft, 908-321-6669
Dave Greenlaw, 908-906-6817

EPCRA: For Toxic Release Inventory: Dan Kraft, 908-321-6669
Nora Lopez, 908-906-6890

For Emergency Planning & Community Right-to-Know:
John Higgins, 908-906-6194

SPCC/FRP: Doug Kodama, 908-906-6905

Federal Facilities: Laura Livingston, 637-3494

NPDES and Pretreatment: John Kushwara, 637-3762

UIC: Frank Brock, 637-3875

Public Water Supply: Robert Williams, 637-3879

Wetlands: Daniel Montella, 637-3801

Removal Actions: Richard Salkie, 908-321-6658
Bruce Sprague, 908-321-6656
John Witkowski, 908-321-6991

Radiation: Michael Buccigrossi, 637-4008

FIFRA: Fred Kozak, 908-321-6769

Criminal Investigations Division - William V. Lometti: 637-3634

Section Chiefs should contact their appropriate counterpart(s) on the above list concerning potential violations noted on the checklist or otherwise.

Scirpus cyperinus (L.) Kunth
Wool grass or Woolly Sedge

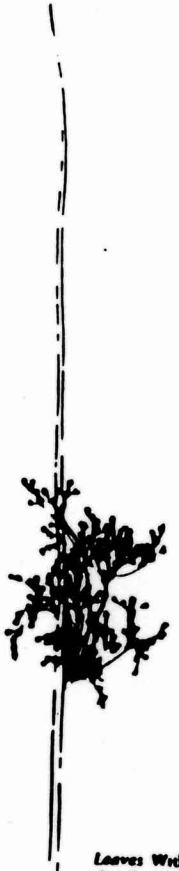
Range Newfoundland to Saskatchewan, south to North Carolina and Oklahoma
Habitat Marshes, wet meadows, and ditches
General characteristics Plants up to 5 feet tall, growing in small groups, stems with long, narrow, rigid leaves, flowers crowded into small, oval, woolly spikelets in loose, drooping clusters at the top of the stem
Stem Upright, bluntly triangular, up to ¼ inch thick, from a fibrous rooted base

Leaves Stem leaves up to 16 inches long and ⅛ inch wide, those immediately below the flower clusters three to five, sheaths closed except at summit
Inflorescence Flowers inconspicuous in the axils of the overlapping scales of the brownish spikelets, spikelets in clusters of six to twelve at the ends of long, somewhat drooping branches, flower cluster up to 12 inches long, much-branched, flowering during August–September
Fruit A whitish, seed like nutlet with bristles much longer than the scales attached to the base; the bristles impart the woolly appearance to the spikelets

Carex lurida Wahlenb
Sedge

Range Nova Scotia to Minnesota, south to Florida and Mexico
Habitat Wet meadows, marshes, ditches, edges of pools and ponds
General characteristics Plants up to 3 feet tall, generally growing in dense clumps, stems bearing several long, narrow leaves with rough surfaces, male and female flowers in separate spikes, the latter in the axils of the uppermost leaves
Stem Sharply three angled and smooth, from a fibrous rooted base

Leaves Up to 10 inches long and ¼ inch wide, those immediately below the flower clusters resembling the stem leaves, leaf sheath with a ligule at the junction of the blade, closed except at summit
Inflorescence Flowers in the axils of scales with long tips and aggregated in spikes, the male spike single, erect at the top of the stem, soon withering; female spikes two to four, thick-cylindrical, up to 2½ inches long and ¾ inch thick, sessile or short-stalked, erect or somewhat drooping, very densely flowered, flowering during June–July
Fruit A brown, seed like nutlet enclosed in an inflated sac (the perigynium)



JUNCACEAE
Rush Family
Juncus effusus L.
Soft Rush

Range Throughout southern Canada and the United States
Habitat Wet meadows, marshes, edges of ponds and bogs, shallow water
General characteristics Grass like plants up to 5 feet tall, apparently leafless, in tussocks of up to several hundred stems, flowers in loose clusters borne on the side of the stem up to one third of the way down from the top
Stem Upright, soft and green, finely striate, arising from a stout rhizome hidden among the tussocks

Leaves Without blades, represented by sheaths at the base of the stem
Inflorescence Flowers small and greenish to brown with three scale like, pointed sepals and three smaller petals, numerous, flower clusters with many forking branches of variable lengths, the flowers at the tops of the smaller branches, flowering during July–August
Fruit A brownish capsule with three partitions containing many seeds
Commonly confused species *Scirpus* spp (bulrushes), rushes may be distinguished from bulrushes by the fact that the fruits consist of capsules in the former group and nutlets in the axils of spikelet scales in the latter group

Several Common Wetlands Plants from Freshwater Wetlands: A Guide to Common Indicator Plants of the Northeast, Univ. of Mass. Press, 1981

MATERIAL SURVEY

safety-kleen

SK USE ONLY
SAFETY-KLEEN CUSTOMER NUMBER 2-118408
SK LINE OF BUSINESS # 24 (EX. USE 24 FOR FRS, 28 FOR SKOS)
Control No. _____
Lab No. _____

SK SURVEY NO. 1063112

A
Generator Name GENERAL MECHATRONICS
Nature of Business AIRCRAFT MFG. S.I.C. No. _____
ID Numbers: Federal EPA _____ State _____ ID _____ State _____ ID _____
Status: ☐ Large Quantity Generator (LQG) ☒ Small Quantity Generator (SQG) ☐ Conditionally Exempt Small Quantity Generator (CESQG)

B
Facility Street Address (No P.O. Boxes) ☒ Manifest Address
General Mechatronics
60 Milbar Blvd.
City FARMINGDALE State NY Zip 11735

Billing Name & Address (If Different) ☐ Manifest Address
City State Zip

C
General Description of Material Speedy-Dri, Aluminum Oil, Rags
Process Description clean-up
Generation Amount 825 Gallons
Per ☐ Week ☒ Month ☐ Quarter ☐ Year ☐ One Time Only
Gallons On Hand 950 ☒ Drums ☐ Bulk
Shipping Schedule MONTHLY ☐ Drums ☐ Bulk
Physical Description: Color: BROWN
Percent Solids that Could Not be Sampled 25%
Sampled Solids From Top of Drum ☒ Yes ☐ No
Sampled Solids From Bottom of Drum ☐ Yes ☒ No
pH Range ☐ <=2.0 ☐ 2-4 ☒ 4-10 ☐ 10-12.5 ☐ >=12.5
Layers or Phases ☒ One ☐ Two ☐ Three
Physical State ☐ Liquid ☐ Paste ☒ Solid

D
Material Composition ☒ Vol % ☐ Wt %

	Max	Typical
SPEEDY-DRI		80%
Aluminum		2%
OIL		3%
RAGS/SOCKS		15%
TOTAL (Typical should not exceed 100%)		100 %

E
Attach material safety data sheets (MSDS) for material components and any current EP Toxic, TCLP, or other analysis of the material.
☐ MSDS Attached ☐ EP Toxic Analysis attached ☐ TCLP analysis attached ☐ Other Analysis attached ☐ Other attachments ☒ No attachments

F-1 Determine if any of the following prohibited substances may be in the material. MUST BE COMPLETED!
☐ Yes ☒ No DOT Radioactive, Explosives, or materials forbidden from transport.
☐ Yes ☒ No TSCA regulated materials, Chlorinated biphenyls (PCB), Brominated biphenyls (PBB), Chlorinated dibenzodioxins or furans.
☐ Yes ☒ No Products used as pesticides, herbicides, insecticides, or by-products of pesticide manufacture.
☐ Yes ☒ No Human carcinogens above exclusion levels as defined by OSHA (Ref. 29 CFR 1910.1001-).
☐ Yes ☒ No Reactive components (Sulfides, Cyanides, Shock sensitive materials, Pyrophoric compounds).
☐ Yes ☒ No Biological hazards (such as Pathogenic materials, Infectious agents, Etiologic agents, USEPA Medical Waste).

F-2 Determine if any of the following restricted substances may be in the material. MUST BE COMPLETED!
☐ Yes ☒ No Toxic metals (Arsenic, Barium, Beryllium, Cadmium, Chromium, Lead, Mercury, Nickel, Selenium, Silver, Thallium).
☐ Yes ☒ No Water or amine-reactive components (such as unreacted Isocyanate monomers and resins, Acid chlorides, Anhydrides, Epoxides).

F-3 If yes, then identify substances and concentration _____

G DOT Hazardous Material Description
Proper Shipping Name _____
Hazard Class _____ UN/NA Number _____ P.G. _____ ☐ Not DOT Hazardous Material ☒ Not sure

SK USE ONLY ☐ Accepted for Analysis ☐ Accepted Conditionally ☐ Suspended for More Information ☐ Rejected
Comments _____
_____ Safety Evaluated By _____ Date _____

GENERATOR

SAFETY-KLEEN CORP. (see attached information)

GENERATOR WASTE DETERMINATION CERTIFICATION

SK SURVEY NO. 1063112

Generator GENERAL MECHATRONICS

Waste Description SPEEDY-DRI/OIL

Process Description CLEAN-UP

2-118-08

SAFETY-KLEEN CUSTOMER NUMBER

A. The generator must determine if the material is excluded from regulation under 40 CFR 261.

	Yes	No	Not Sure
1. Is this material exempt from waste regulations under RCRA (i.e. not a "solid waste" per 40 CFR 261.2?	☑ (If Yes, Stop)	☐	☐
2. Is this waste exempt "used oil", for fuel or recovery, not disposal? (Ref. 40 CFR 279)	☐ (If Yes, Stop)	☑	☐
3. Is this waste exempt from regulation as a hazardous waste, per 261.4? If yes, explain why in Comments.	☐ (If Yes, Stop)	☑	☐

IF ANY ANSWER IN SECTION A IS "YES", THEN STOP. EXEMPT WASTES DO NOT REQUIRE THIS CERTIFICATION.

B. The generator must determine if the waste is regulated as a "listed" hazardous waste.

	Yes	No	Not Sure
1. Is waste listed as a hazardous waste in subpart D of 40 CFR part 261 (Ref. 40 CFR 261.31, 32, or 33)?		✓	
2. Has waste been mixed with any other waste? (If yes, then describe other wastes in Comments.)		✓	
3. Has waste been treated in any way? (If yes, then describe starting materials and explain in Comments.)		✓	

C. Generator must determine if the waste is regulated for every characteristic under 40 CFR 261.30.
(Check one for each parameter or one for each section)

Is determination based on laboratory analysis? (If yes, then a copy of the analysis must be attached.)
[Note that Safety-Kleen Corp. Prequalification Analysis may not be acceptable.]

	Yes	No	Partial
		✓	

Waste Code	Parameter (Evaluation method)	Yes	No	Not Sure
D001	**Ignitability (see attachment)**		✓	
D002	**Corrosivity (see attachment)**		✓	
D003	**Reactivity (see attachment)**		✓	
	TCLP Metals (SW-846 6010 & 7000)		✓	
D004	Arsenic			
D005	Barium			
D006	Cadmium			
D007	Chromium			
D008	Lead			
D009	Mercury			
D010	Selenium			
D011	Silver			
	TCLP Pesticides (SW-846 8080 & 8150)		✓	
D012	Endrin			
D013	Lindane			
D014	Methoxychlor			
D015	Toxaphene			
D016	2,4-D			
D017	2,4,5-TP (Silvex)			
D020	Chlordane			
D031	Heptachlor			

Waste Code	Parameter (Evaluation method)	Yes	No	Not Sure
	TCLP Volatiles (SW-846 8240)		✓	
D018	Benzene			
D019	Carbon Tetrachloride			
D021	Chlorobenzene			
D022	Chloroform			
D027	Dichlorobenzene, 1,4-			
D028	Dichloroethane, 1,2-			
D029	Dichloroethylene, 1,1-			
D035	Methyl Ethyl Ketone			
D039	Tetrachloroethylene			
D040	Trichloroethylene			
D043	Vinyl Chloride			
	TCLP Semivolatiles (SW-846 8270)		✓	
D023	Cresol,o-			
D024	Cresol, m-			
D025	Cresol, p-			
D026	Cresols (total)			
D030	Dinitrotoluene			
D032	Hexachlorobenzene			
D033	Hexachlorobutadiene			
D034	Hexachloroethane			
D036	Nitrobenzene			
D037	Pentachlorophenol			
D038	Pyridine			
D041	2,4,5-Trichlorophenol			
D042	2,4,6-Trichlorophenol			

California Hazardous Characteristics (22 CCR 66261.24(a)(2)-(8))			
Waste Extraction Test (WET)			
Static Acute Bioassay Procedure			

D. Comments NOT A LISTED, MIXED WITH, OR CHARACTERISTIC HAZARDOUS WASTE.

E. Generator Certification:
On behalf of the Generator, I hereby warrant, represent, and certify that all information in this document is true, accurate, and complete; and that I am a duly authorized employee of the Generator. Generator agrees to indemnify and hold Safety-Kleen Corp. and its subsidiaries harmless for any damages, assessments, penalties, costs, attorney's fees, etc., arising out of, or in any way related to breach of the above warranty by the Generator.

Name Robert Sanchez Title Facilities Manager

Signature [signature] Date 11-7-96 Phone (56)

Sales Representative Name AL. RAMOS Branch No. 2-118-08

H EPA Waste Description and Treatment Standards

(COMPLETE ALL QUESTIONS WITHIN ONE SECTION ONLY).

☑ CHECK ONE BOX ON LEFT

SK SURVEY NO. 1063112

IS THIS MATERIAL A RCRA "HAZARDOUS WASTE"? (Ref. 40 CFR 261)

SECTION H-1

☐ YES

1. For hazardous wastes, if waste is a "listed" waste, such as "spent solvent" (F001-5), then show the applicable EPA Waste Codes:
   ☐ F001 ☐ F002 ☐ F003 ☐ F004 ☐ F005 ☐ F006 ☐ K086 Other, specify _____ _____
   _____ _____ _____ _____ _____ _____ _____ _____ ☐ Not Applicable
2. For all hazardous wastes, the generator must determine if waste exhibits a characteristic of a hazardous waste, either based on knowledge or testing. Based on this determination, show all applicable EPA Waste Codes.
   ☐ D001 ☐ D002 ☐ D003 ☐ D004 ☐ D005 ☐ D006 ☐ D007 ☐ D008 ☐ D009 ☐ D010 ☐ D011
   _____ _____ _____ _____ _____ _____ _____ _____ ☐ Not Applicable
   _____ _____ _____ _____ _____ _____ _____ _____
3. List all applicable State Waste Codes required by generating facility state: _____ _____ ☐ None Required ☐ Not sure

SECTION H-2

☒ NO

For explanation of "Exempt" wastes, see last page.

1. Is this material exempt from waste regulations under RCRA (i.e., not a "solid waste" per 40 CFR 261.2)? (Ex. discarded unused product solvent for recovery; fuel oil for use as fuel) ☑ Yes (Skip to 4) ☐ No
2. Is this waste an exempt "used oil", for fuel or recovery, not disposal? (Ref. 40 CFR 279) (Ex. automotive oils; machining oil; metal-working coolants; synthetic oil) ☐ Yes (Skip to 4) ☑ No
3. Is this waste exempt from regulation as a hazardous waste, per 261.4? If yes, explain why in Comments. (Ex. sample for analysis, petroleum exploration and production from field wells) ☐ Yes (Skip to 4) ☑ No
4. List all applicable State Waste Codes required by generating facility state: _____ _____ ☑ None required ☐ Not sure

NOTE: IF ALL THE "NO" BOXES ARE CHECKED IN SEC H-2, THEN PLEASE FILL OUT A GENERATOR WASTE DETERMINATION CERTIFICATION OR SUBMIT A TCLP ANALYSIS.

H-3

When a generator is unable to identify the proper characterization of a waste to avoid delays and extra expense, Safety-Kleen's representative will draw a waste sample for a TCLP analysis and a Prequalification analysis.

I

Safety-Kleen Corp. requires a representative sample and charges a fee for the prequalification of all new material. P.O. No. _____

Type of sample: ☐ From Line ☐ From Tank ☒ Composite of 1 drums Sample taken by ☐ Customer ☒ Safety-Kleen Representative

J Generator Certification (Not a waste handling agreement):

On behalf of the Generator, I hereby warrant, represent, and certify that: all information submitted in this document is true, accurate, and complete; all known or suspected hazards have been disclosed; and, I am a duly authorized employee of the Generator.

Generator agrees to indemnify and hold Safety-Kleen Corp. and its subsidiaries harmless for any damages, assessments, penalties, costs, attorney's fees, etc., arising out of, or in any way related to breach of the above warranty by the Generator.

Name Robert SANCHEZ Title Facilities Manager

Signature X [signature] Date 11-7-96 Phone (5/6)

Contact _____ Title _____ Phone ( )

Comments NOT A LISTED, MIXED with, or Characteristic Hazardous WASTED.

Sales Representative Name AL. RAMOS SK Employee Number 3912 Territory or Branch No. 2-118-08

SK USE ONLY ☐ Sample leaked in transit ☐ Survey number did not match sample label ☐ Survey information incomplete

Sample Received _____ Completed Survey Received _____ Survey Logged _____

Comments _____

Survey Entered By _____ Date _____ Survey Verified By _____ Date _____

Analysis Entered By _____ Date _____ Data Verified By _____ Date _____

SAFETY-KLEEN CORP.
GENERATOR WASTE DETERMINATION CERTIFICATION
ADDITIONAL INFORMATION

According to USEPA regulations in 40 CFR 262.11 (Hazardous Waste Determination),

A person who generates a solid waste [including liquid wastes]**, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste using the following method:**

(a) He should first determine if the waste is excluded from regulation under 40 CFR 261.4. [see section A]

[Exempt wastes are excluded from regulation as listed or characteristic hazardous wastes. Such wastes are allowed to have characteristics of a hazardous waste without being regulated a hazardous wastes. Similarly, used oils for recycling are regulated under 40 CFR 279 and are exempt from regulation as hazardous wastes.]

(b) He must then determine if the waste is listed as a hazardous waste in subpart D of 40 CFR part 261. [see section B]

(c) ... the generator must then determine whether the waste is identified in subpart C of 40 CFR part 261 by either:

(1) Testing the waste according to the methods set forth in subpart C of 40 CFR part 261....

(2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used. [see section C]

According to USEPA regulations in subpart C of 40 CFR 261 (Characteristics of Hazardous Waste), in 261.20 (General):

(a) A solid waste [including liquid wastes]**, as defined in 261.2, which is not excluded from regulation as a hazardous waste under 261.4(b), is a hazardous waste if it exhibits any of the characteristics identified in this subpart.**

(b) A hazardous waste which is identified by a characteristic in this subpart is assigned every EPA Hazardous Waste Number that is applicable as set forth in this subpart....

Characteristic	Subcategory	Evaluation Method
Ignitability (40 CFR 261.21)	Liquid Flash Point	SW-846 1010 or 20
D001	Ignitable Solid	40 CFR 261.21(a)(2)
	Ignitable Gas	49 CFR 173.300
	Oxidizer	49 CFR 173.151
Corrosivity (40 CFR 261.22)	Aqueous pH	SW-846 9040
D002	Liquid Corrosivity	SW-846 1110
Reactivity (40 CFR 261.23)	Cyanides	D5049-90/SW-846 9010
D003	Sulfides	D4978-89A/SW-846 9030
	Water Reactivity	40 CFR 261.23(a)(2-4)
	Instability	40 CFR 261.23(a)(a)
	Explosives	40 CFR 261.23(a)(7-8)
Toxicity (40 CFR 261.24)		TC Leaching Procedure in
D004-D043		40 CFR 261 Appendix II

Safety-Kleen Corp. Material Survey Reference

COMMON CHEMICAL NAME	OTHER NAMES & USES	SK CODES	TCLP CHARACTERISTIC WASTE CODES	COMMON LISTED WASTE CODES
NON-CHLORINATED SOLVENTS				
Acetone	Thinner, Paint	ACE		F003
Benzene *	Gasoline, Petroleum products	BENZ	D018	**
Butyl Alcohol, iso-	Isobutanol, 2-methylpropanol	IBA		F005
Butyl Alcohol, n-	1-Butanol	NBA		F003
Carbon Disulfide *	Laboratory solvent	CS2		F005
Cresol, meta- *	Cresylic acid	CSLM	D024	F004
Cresol, ortho- *	Cresylic acid	CSLO	D023	F004
Cresol, para- *	Cresylic acid	CSLP	D025	F004
Cresols (mixture) *	Cresylic acid, Cold Parts Cleaner, Enamels	CSLS	D026	F004
Cyclohexanone	Cyclohexyl Ketone, Ink solvent	CHK		F003
Dinitrotoluene, 2, 4- *		DNT	D030	
Ethyl Acetate	Acetic acid ethyl ester	ETAC		F003
Ethyl Ether *	Laboratory solvent	ETE		F003
Ethylbenzene	Part of commercial xylenes	ETB		F003
Ethylene Gylcol Ethyl Ether *	2-Ethoxyethanol, Gylcol Ether EE, Paint	EGEE		F005
Methanol	Methyl alcohol, Wood alcohol	MEOH		F003
Methyl Ethyl Ketone	2-Butanone, MEK, Paint, Thinner	MEK	D035	F005
Methyl Isobutyl Ketone	MIBK, Thinner, Paint	MIBK		F003
Nitrobenzene *		NB	D036	F004
Nitropropane, 2- *	Paint	NP2		F005
Pyridine *	Laboratory solvent	PYR	D038	F005
Toluene	Thinner, Paint, Glue	TOL		F005
Xylene	Dimethylbenzenes, Thinner, Paint	XYLS		F003
CHLORINATED SOLVENTS				
Carbon Tetrachloride *		CCL4	D019	F001
Chlorinated Fluorocarbon *	Freon, CFC, Racon	CFC		**
Chlorobenzene	Monochlorobenzene	MCB	D021	F002
Chloroform *	Laboratory solvent	CHCL	D022	
Dichlorobenzene, ortho-	1, 2-Dichlorobenzene, ODCB	ODCB		F002
Ethylene Dichloride *	1, 2-Dichloroethane, Laboratory solvent	EDC	D028	
Methylene Chloride *	Dichloromethane, Paint stripper	MECL		F001/2
Perchloroethylene	Tetrachloroethylene, "Perc", Dry Cleaning	PERC	D039	F001/2
Trichloroethane, 1, 1, 1-	Methyl Chloroform, "Trichlor", Degreasing	111		F001/2
Trichloroethane 1, 1, 2- *		112		F002
Trichloroethylene	Trichloroethene, "Trichlor", Degreasing	TCE	D040	F001/2
Trichlorofluoromethane *	MF, CFC 11, Blowing agent, Refrigerant	FMF		**
Trichlorotrifluoroethane	TF, CFC 113, Solvent F, Degreasing	FTF		F001/2
OTHER CHLORINATED COMPOUNDS				
Chlorinated Biphenyls *	PCB, Transformer Fluid, Capacitors	PCB		TSCA
Dichlorobenzene, para-	1, 4-Dichlorobenzene, Component of ODCB	PDCB	D027	
Hexachlorobenzene		HCB	D032	
Hexachlorobutadiene *		HCBD	D033	
Hexachloroethane *		HCE	D034	
Trichlorophenol, 2, 4, 5-		TCP5	D041	
Trichlorophenol, 2, 4, 6-		TCP6	D042	
Vinyl Chloride *	Monomer	VC	D043	
Vinylidene Dichloride *	1, 1-Dichloroethene, Monomer, 111 impurity	VDC	D029	
METALS *				
Arsenic *	Wood treatment	AS	D004	
Barium *	Pigment	BA	D005	
Cadmium *	Pigment	CD	D006	
Chromium III *	Pigment	CR3	D007	
Chromium VI *	Chromate, Pigment	CR6	D007	
Lead *	Solder, Lead Batteries	PB	D008	
Mercury *		MERC	D009	
Nickel *	Steel	NI		CA List
Selenium *		SE	D010	
Silver *		AG	D011	
Thallium *		TL		CA List
PESTICIDES *				
Acetic Acid (2, 4-Dichlorophenoxy)- *	2, 4-D	D24	D016	
Chlordane *	Termite Control	CLDN	D020	
Endrin *		EDRN	D012	
Heptachlor (and its hydroxide) *		HPTC	D031	
Lindane *	Benzene Hexachloride, BHC	LNDN	D013	
Methoxyclor *		MTXC	D014	
Pentachlorophenol *	"Penta", PCP, Wood Treatment	PCP	D037	
Silvex *	2, 4, 5-TP	SLVX	D017	
Toxaphene *		TXPN	D015	

* Safety-Kleen restricts the handling of these chemicals. Contact a SK representative to determine restrictions.

** NOT A COMMON LISTED WASTE CODE.

MATERIAL SURVEY

Safety-Kleen

SK USE ONLY: 2-118-08-2042 SAFETY-KLEEN CUSTOMER NUMBER — Control No. _____
SK LINE OF BUSINESS # 24 (EX. USE 24 FOR FRS, 28 FOR SKOS) — Lab No. _____

SK SURVEY NO. 1126958

A Generator Name General Mechatronics

Nature of Business MAchine Shop S.I.C. No. ____

ID Numbers: Federal EPA CESQG State ___ ID ___ State ___ ID ___

Status: ☐ Large Quantity Generator (LQG) ☐ Small Quantity Generator (SQG) ☒ Conditionally Exempt Small Quantity Generator (CESQG)

B Facility Street Address (No P.O. Boxes) ☒ Manifest Address

General Mechatronics
60 Milbar Ave.
City Farmingdale State NY Zip 11735

Billing Name & Address (If Different) ☐ Manifest Address

City State Zip

C General Description of Material TRICHLOROETHYLENE

Process Description Degreasing

Generation Amount 16 Gallons

Per ☐ Week ☒ Month ☐ Quarter ☐ Year ☐ One Time Only

Gallons On Hand 10 ☒ Drums ☐ Bulk

Shipping Schedule Monthly ☒ Drums ☐ Bulk

Physical Description: Color: clear

Percent Solids that Could Not be Sampled 0

Sampled Solids From Top of Drum	☒ Yes	☐ No			
Sampled Solids From Bottom of Drum	☒ Yes	☐ No			
pH Range	☐ <=2.0	☐ 2-4	☒ 4-10	☐ 10-12.5	☐ >=12.5
Layers or Phases			☒ One	☐ Two	☐ Three
Physical State			☒ Liquid	☐ Paste	☐ Solid

D Material Composition ☒ Vol % ☐ Wt %

Material	Max	Typical
Trichloroethylene		100 %
TOTAL (Typical should not exceed 100%)		100 %

E Attach material safety data sheets (MSDS) for material components and any current EP Toxic, TCLP, or other analysis of the material.

☐ MSDS Attached ☐ EP Toxic Analysis attached ☐ TCLP analysis attached ☐ Other Analysis attached ☐ Other attachments ☒ No attachments

F-1 Determine if any of the following prohibited substances may be in the material. MUST BE COMPLETED!

- ☐ Yes ☒ No DOT Radioactive, Explosives, or materials forbidden from transport.
- ☐ Yes ☒ No TSCA regulated materials, Chlorinated biphenyls (PCB), Brominated biphenyls (PBB), Chlorinated dibenzodioxins or furans.
- ☐ Yes ☒ No Products used as pesticides, herbicides, insecticides, or by-products of pesticide manufacture.
- ☐ Yes ☒ No Human carcinogens above exclusion levels as defined by OSHA (Ref. 29 CFR 1910.1001-).
- ☐ Yes ☒ No Reactive components (Sulfides, Cyanides, Shock sensitive materials, Pyrophoric compounds).
- ☐ Yes ☒ No Biological hazards (such as Pathogenic materials, Infectious agents, Etiologic agents, USEPA Medical Waste).

F-2 Determine if any of the following restricted substances may be in the material. MUST BE COMPLETED!

- ☐ Yes ☒ No Toxic metals (Arsenic, Barium, Beryllium, Cadmium, Chromium, Lead, Mercury, Nickel, Selenium, Silver, Thallium).
- ☐ Yes ☒ No Water or amine-reactive components (such as unreacted Isocyanate monomers and resins, Acid chlorides, Anhydrides, Epoxides).

F-3 If yes, then identify substances and concentration _____

G DOT Hazardous Material Description

Proper Shipping Name _____

Hazard Class _____ UN/NA Number ___ P.G. _____ ☐ Not DOT Hazardous Material ☒ Not sure

SK USE ONLY ☐ Accepted for Analysis ☐ Accepted Conditionally ☐ Suspended for More Information ☐ Rejected

Comments _____

_____ Safety Evaluated By _____ Date _____

GENERATOR

H EPA Waste Description and Treatment Standards

(COMPLETE ALL QUESTIONS WITHIN ONE SECTION ONLY).

☑ CHECK ONE BOX ON LEFT

SK SURVEY NO. 1126958

IS THIS MATERIAL A RCRA "HAZARDOUS WASTE"? (Ref. 40 CFR 261)

SECTION H-1 — YES

1. For hazardous wastes, if waste is a "listed" waste, such as "spent solvent" (F001-5), then show the applicable EPA Waste Codes:

☒ F001 ☐ F002 ☐ F003 ☐ F004 ☐ F005 ☐ F006 ☐ K086 Other, specify _____ _____

_____ _____ _____ _____ _____ _____ _____ _____ ☐ Not Applicable

2. For all hazardous wastes, the generator must determine if waste exhibits a characteristic of a hazardous waste, either based on knowledge or testing. Based on this determination, show all applicable EPA Waste Codes.

☐ D001 ☐ D002 ☐ D003 ☐ D004 ☐ D005 ☐ D006 ☐ D007 ☐ D008 ☐ D009 ☐ D010 ☐ D011

D040 _____ _____ _____ _____ _____ _____ _____ ☐ Not Applicable

_____ _____ _____ _____ _____ _____ _____ _____

3. List all applicable State Waste Codes required by generating facility state: _____ _____ ☐ None Required ☐ Not sure

SECTION H-2 — NO

For explanation of "Exempt" wastes, see last page.

1. Is this material exempt from waste regulations under RCRA (i.e., not a "solid waste" per 40 CFR 261.2)? (Ex. discarded unused product solvent for recovery; fuel oil for use as fuel) ☐ Yes (Skip to 4) ☐ No

2. Is this waste an exempt "used oil", for fuel or recovery, not disposal? (Ref. 40 CFR 279) (Ex. automotive oils; machining oil; metal-working coolants; synthetic oil) ☐ Yes (Skip to 4) ☐ No

3. Is this waste exempt from regulation as a hazardous waste, per 261.4? If yes, explain why in Comments. (Ex. sample for analysis, petroleum exploration and production from field wells) ☐ Yes (Skip to 4) ☐ No

4. List all applicable State Waste Codes required by generating facility state: _____ _____ ☐ None required ☐ Not sure

NOTE: IF ALL THE "NO" BOXES ARE CHECKED IN SEC H-2, THEN PLEASE FILL OUT A GENERATOR WASTE DETERMINATION CERTIFICATION OR SUBMIT A TCLP ANALYSIS.

H-3

When a generator is unable to identify the proper characterization of a waste to avoid delays and extra expense, Safety-Kleen's representative will draw a waste sample for a TCLP analysis and a Prequalification analysis.

I

Safety-Kleen Corp. requires a representative sample and charges a fee for the prequalification of all new material. P.O. No. _____

Type of sample: ☐ From Line ☐ From Tank ☒ Composite of 2 drums Sample taken by ☐ Customer ☒ Safety-Kleen Representative

J Generator Certification (Not a waste handling agreement):

On behalf of the Generator, I hereby warrant, represent, and certify that: all information submitted in this document is true, accurate, and complete; all known or suspected hazards have been disclosed; and, I am a duly authorized employee of the Generator.

Generator agrees to indemnify and hold Safety-Kleen Corp. and its subsidiaries harmless for any damages, assessments, penalties, costs, attorney's fees, etc., arising out of, or in any way related to breach of the above warranty by the Generator.

Name Robert Sanchez Title MAINTENANCE DEPT.

Signature X [signature] Date 8-5-97 Phone (516) 249-7900

Contact _____ Title _____ Phone ( )

Comments _____

Sales Representative Name AL. RAMOS SK Employee Number 3912 Territory or Branch No. 2-118-08

SK USE ONLY ☐ Sample leaked in transit ☐ Survey number did not match sample label ☐ Survey information incomplete

Sample Received _____ Completed Survey Received _____ Survey Logged _____

Comments _____

Survey Entered By _____ Date _____ Survey Verified By _____ Date _____

Analysis Entered By _____ Date _____ Data Verified By _____ Date _____

State of New Jersey
Department of Environmental Protection and Energy
Hazardous Waste Regulation Program
Manifest Section
CN 421, Trenton, NJ 08625-0421

2-118-08

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.) *Form Approved. OMB No. 2050-0039. Expires 9-30-96*

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CES 08 | Manifest Document No. 01140 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
GENERAL MECHATRONICS
ROBERT SACHEZ
FARMINGDALE
60 MILBAR BLVD
NY 11735

4. Generator's Phone (516) 249-7900

A. State Manifest Document Number **NJA2742767**

B. State Generator's ID-(Gen. Site Address) SAME

5. Transporter 1 Company Name: SAFETY-KLEEN CORP.
6. US EPA ID Number: ILD 984908402
C. State Trans. ID-NJDEPE: 08690
Decal No.-

7. Transporter 2 Company Name
8. US EPA ID Number
D. Transporter's Phone (516) 842-6311
E. State Trans. ID-NJDEPE
Decal No.-

9. Designated Facility Name and Site Address 000635
SAFETY-KLEEN CORP.
1200 SYLVAN STREET
LINDEN, NJ 07036
10. US EPA ID Number: NJD 002182697
F. Transporter's Phone ( )
G. State Facility's ID
H. Facility's Phone (908) 862-2000

11. US DOT Description (Including Proper Shipping Name, Hazard Class or Division, ID Number and Packing Group)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ WASTE TRICHLOROETHYLENE 6.1 UN1710 PG III (F001)(ERG#160)	X	001	DM	00175	P	F001
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
a. D040 LTE
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a.
b.
c.
d.

15. Special Handling Instructions and Additional Information
NPST R/T# 94174064 2-118-08-2042
EMERGENCY RESP 800-468-1760(24 HR). IF UNDELIVERABLE RETURN TO GENERATOR.
SK CORP AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY.
PLATE [illegible](NY)
CONTROL A1719700
SKDOT# A: 507 B: C: D:

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: ROBERT SANCHEZ | Signature | Month Day Year: 9 17 97

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: [illegible] | Signature | Month Day Year: 9 17 97

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Month Day Year

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection and Energy. (609) 292-7172

8—GENERATOR COPY

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

Material Safety Data Sheet 12/92

Section 1 - Manufacturer's Name

Hangsterfer's Laboratories, Inc.
Ogden Road
Mantua, New Jersey 08051-0128

Emergency Telephone: (609) 468-0216
Information Telephone: 800-433-LUBE

Product Identity: HANGSTERFER'S HE-2

Section 2 - Ingredients

Not listed as carcinogenic by IARC, NTP, OSHA, ACGIH

Hangsterfer's HE-2 contains the following non-hazardous ingredients:

Petroleum Oil	CAS#64741-96-4
Petroleum Sulfonate	CAS#68608-26-4
Chlorinated Paraffin	CAS#63449-39-8
Tall Oil Fatty Acids	CAS#61790-12-3

Mineral oil mist develops when product is misted.

Mineral oil mist - Limits:	OSHA PEL	ACGIH TLV	ACGIH STEL
	5.0 mg/m3	5.0 mg/m3	10mg/m3

Hazardous Materials Identification System (HMIS)
Health - 1 Flammability - 1 Reactivity - 0
(0=Insignificant, 1=Slight, 2=Moderate, 3=High, 4=Moderate

Section 3 - Physical/Chemical Characteristics

Appearance and Odor: Green liquid, mild odor.
Specific Gravity (Water=1): 0.980-1.005
Flash Point (C.O.C.): 198 Degrees C (390 Degrees F)
Flammable Limits: LEL: 1%/Vol. UEL: 7%/Vol.
Boiling Point: >100 Degrees C (212 Degrees F)
Melting Point: N.A.
Evaporation Rate (n Butyl Acetate =1): <0.01
Vapor Pressure (mm HG.): <0.01
Vapor Density (Air=1): >5
Solubility in Water: 100%
Product pH @ 10%/Vol: 9.0

Section 4 - Fire and Explosion Hazard Data

Extinguishing Media: Use water fog, foam, dry chemical or carbon dioxide. Do not use direct stream of water.
Special Fire Fighting Procedures: Treat as an oil fire. Respirator and eye protection required for fire fighting personnel.
Unusual Fire and Explosion Hazards: Possible HCL fumes, sulfur oxides, fumes, smoke, carbon monoxide and dioxide, and other decomposition products.

Conditions to Avoid: High temperatures, misting and open flame, also strong oxidizers, magnesium and metals containing high amounts of magnesium.

Section 5 - Reactivity Data:

1. Decomposition: Product is stable.
2. Hazardous Polymerization: Will not occur
3. Incompatibility (materials to avoid): Oxidizing materials.

Section 6 - Health Hazard Data:

Carcinogenicity: None known.

Health Hazards: Vapors at high temperatures may cause respiratory irritation. Product may be mildly irritating to the skin after prolonged contact.

Signs and Symptoms of Exposure: Irritations as noted above.

Medical Conditions Generally Aggravated by Exposure: Preexisting skin and respiratory disorders may be aggravated.

Possible Route(s) of Entry - First Aid and Emergency Procedures:

Eyes: Possible - Flush with water for 15 minutes. Get medical attention.

Skin: Highly Unlikely - Remove contaminated clothing and launder. Wipe off excess, and wash with soap and water.

Ingestion: Highly unlikely - Do not induce vomiting. Get medical advice.

Inhalation: Highly Unlikely - Remove to fresh air.

Section 7 - Precautions for Safe Handling and Use

Steps to be Taken in Case Material is Released or Spilled:

1. Shut off source of leak if safe to do so.
2. Pick up and store for reuse any clean material.
3. Soak up residue with an absorbent.

Waste Disposal Method: Place in an appropriate disposal container and dispose of in compliance with local, state and federal regulations.

Precautions to be Taken in Handling and Storing: Minimize skin contact. Wash with soap and water before eating, drinking smoking or using toilet facilities. Launder contaminated clothing before reuse.

Other Precautions: Store in a cool, dry place with adequate ventilation.

Section 8 - Control Measures

Respiratory Protection: If exposure may or does exceed occupation exposure limits use a NIOSH approved respirator to prevent overexposures.

Ventilation:

Local Exhaust - Meet OSHA Limits
Mechanical- Meet OSHA Limits
Special - None required
Other - None required

Protective Gloves: Oil impervious recommended

Eye Protection: Safety splash goggles/glasses recommended.

Other Protective Clothing or Equipment: Normal industrial work apparel.

Work/Hygienic Practices: Exercise good industrial hygiene.

N/D = Not Determined N.A. = Not Applicable

This information is furnished without warranty, expressed or implied, except that it is accurate to the best knowledge of Hangsterfer's. The data on this sheet relates only to the specific material designated herein. Hangsterfer's assumes no legal responsibility for use or reliance upon this data.

BILL OF LADING/MANIFEST

1. Shipper's US EPA ID No. (If Applicable)	Document No.	2. Page 1 of 1	00190
CES OG	0.232		

3. Shipper's Name and Mailing Address
GENERAL MECHATRONICS
60 MILBAR BLVD
ROBERT SACHEZ
FARMINGDALE NY 11735

4. Shipper's Phone (516) 249-7900

5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter's Phone
SAFETY-KLEEN CORP.	ILD 984968202	516 842-6311
7. Transporter 2 Company Name	**8. US EPA ID Number**	**B. Transporter's Phone**

9. Designated Facility Name and Site Address 000658
SAFETY-KLEEN CORP.
3700 LAGRANGE ROAD
SMITHFIELD KY 40068

10. US EPA ID Number
KYD 053348108

C. Facility's Phone
502 845-2453

	HM	11. Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a.		WASTE OIL AND ABSORBENT MIXTURE (NOT USDOT HAZARDOUS MATERIAL)	002	~~DM~~ CF	2984	P
b.						
c.						
d.						
e.						

15. Special Handling Instruction and Additional Information
MFST R/T# 94204495 2-118-08-2042
EMERGENCY RESP 800-468-1760(24 HR). IF UNDELIVERABLE RETURN TO GENERATOR.
SK CORP AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY.
PLATE E59459 (NY)
SKDOT# A: 1758 B: C: D:

16a. US DOT HAZARDOUS MATERIALS SHIPPER'S CERTIFICATION: *This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Printed/Typed Name | Signature required here if US DOT regulated | Month | Day | Year

16b. NON-REGULATED SHIPPER'S CERTIFICATION: I certify the materials described above on this form are not subject to federal regulations for Transportation or Disposal.

Printed/Typed Name: X ROBERT SANCHEZ | Sign here if material is not DOT regulated: X Robert Sanchez | Month: 11 | Day: 26 | Year: 97

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Gary Factora | Signature: Gary Factora | Month: 11 | Day: 26 | Year: 97

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month | Day | Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of materials covered by this form except as noted in Item 19.

Printed/Typed Name | Signature | Month | Day | Year

IN EVENT OF EMERGENCY CALL
1-708-688-4660 (24 hours)

GENERATOR'S COPY

safety-kleen®

General Mechatronics
60 Milbar Blvd.
Farmingdale, N.Y. 11735
Attention: Mr. Robert Sanchez
Dear Mr. Sanchez;

We are pleased to quote as follows.

Quantity	*Description*	*Price*	*Unit*	*Catagory*
55-gal.	Non-Hazardous Solids (Oil, speedy-dri, pads)	$ 260.00	Ea.	Incineration

Prices quoted are pending. Each waste stream is analyzed before initial pick-up and disposal. Pricing, regulatory nomenclatures, and disposal technologies are identified and reviewed for accuracy upon completion of this analysis. All subsequent shipments are made based on the findings of the initial results. Additional analysis' are performed each time your materials arrive at the recycle centers before processing. Your company is not invoiced for this verification procedure. This will allow for continual updating of your waste profiles, satisfying any annual review requirements prescribed by the regulatory agencies governing these activities.

Disposal Service to include the following:

* *Regularly scheduled service every twelve weeks*
* *Labor to check, seal, label and load drums on the truck*
* *Transportation to the recycle center*
* *Fingerprint analysis at the T.S.D.F.*
* *Disposal in accordance with all applicable Federal and State Regulations* - as prescribed in the analysis results.
* *Preparation of all required documentation.* (manifests, land disposal restriction notification, Bill of Lading labels, etc.)
* *Safety-Kleens Certificate of Assurance & Indemnification* - Our guarantee to you that in the event a spill should occur, or ground or water pollution should result while we are in control of your waste, we will pay all costs associated with the cleanup of that spill. We back this written guarantee with over $1,000,000,000 in assets.

Respectfully submitted,

Al. Ramos

Branch Industrial Manager

NOTE: 1) Analytical Fee of 475.00 waived -

****

Enforcement sensitive information. Official use only. Shred/burn to dispose.

****

* * * COMPLIANCE MONITORING AND ENFORCEMENT REPORT * * *

Handler Name / ID / Address	S	O	N	P	Regulated Activities
MONITOR CONTROLS CORP INC	1			P	LG
NYD002041358 63 MILBAR BLVD, FARMINGDALE					

- - - EVALUATIONS - - - - - - - - - - - - - - - - -

Type	Date	Seq	Staff	Description	Areas Evaluated (Violations Found)
MMB	10/27/95	001	E NYAJ	RCRA CEI PERFORMED W/SCRE	GER GLB

* * * * * END OF REPORT * * * * *

* * * LISTING OF HANDLER IDENTIFICATION DATA * * *

Handler Name / ID / Address	S	O	N	P	Regulated Activities
MONITOR CONTROLS CORP INC	1	P			LG
NYD002041358 63 MILBAR BLVD, FARMINGDALE					

Low Income and Minority Score: Source:

Mail Address: 63 MILBAR BLVD
FARMINGDALE NY 11735

NOTIF RECEIPT: 10/15/82 CMNTS:

NOTIF CONTACT: JOHN PETAS, VICE PRES

(L) 63 MILBAR BLVD
FARMINGDALE NY 11735

PHONE: 516-694-4210

Current Owner: IKE COHEN

Address: NOT REQUIRED
NOT REQUIRED WY 99999

* * * * * E N D O F R E P O R T * * * * *

No Manifests

From: JOEL GOLUMBEK
To: RVOELKEL
Date: 12/12/97 9:07am
Subject: Circuitron/General Mechatronics -Forwarded -Forwarded -Reply -Forwarded -Reply -Forwarded

See if the other company referenced by Doug is worthwhile. If it has been inspected by the NYSDEC in the last few years, it may not be woth it. Give me your recommendation.

I didn't realize you cc'd Doug on the message to me re Why did it take so long for them to refer it to us. In the future it would probably be wise not to put that kind of comment in.

From: DOUG GARBARINI
To: R2NYC02.R2DECDIV(GOLUMBEK-JOEL)
Date: 12/11/97 5:34pm
Subject: Circuitron/General Mechatronics -Forwarded -Forwarded -Reply -Forwarded -Reply

Thanks Joel

That's called prompt service.

To address Ron's question as to why it took us so long to make the request a number of factors were involved, including: a change in project managers, my request to get a little backup info on the facility before asking for your assistance, and vacations.

Actually, I had been thinking about asking for your assistance at another Long Island site at which we completed the second of two soil cleanups several months ago. We are holding off on implementing a gw remedy at the site until after we collect additional gw samples to determine the impacts that the soil cleanup has had on gw quality; we'll probably finish the design of the treatment system late next year. The facility is the Genzale Plating Company located at 288 New Hyde Park Road, Franklin Square, Nassau Co.

It is an active plating facility. It has been a family run business for the last 60 years-maybe longer; the most recent owner passed away this summer-he had been very difficult to deal with, and we wanted to complete our soil remediation prior to asking for a RCRA inspection. His son has taken over the business and is much better to deal with. We had spoken with John Gorman about the site a few years ago; i believe he indicated that the state or county had done some previous RCRA inspections of the site. Although I assume they have Genzale Plating has its lesson, I had just been thinking that it might be a good idea for EPA RCRA to do an inspection to make sure things are in order. I had walked through the building 2 or 3 years ago, and although i'm not versed in OSHA requirements, the working conditions did not appear to be the greatest.

There is no great rush to do this one. Thanks again.

From: RONALD VOELKEL
To: GOLUMBEK-JOEL
Date: 12/17/97 9:14am
Subject: General Mechatronics and WD Equities

Joel. On December 16, Claudia and I visited the sites referred to us by Doug Garbarini on December 11 and discussed in Carl Garvey's message of November 21.

The General Mechatronics (GM) facility actually encompasses four buildings (55, 60, 63, and 72) on either side of Milbar Boulevard; 72 and 63 Milbar are rented by GM, the latter being listed in the RCRIS database as the site of Monitor Controls (NYD002041258). GM conducts CNC (Computer and Pneumatic Controls) machining of aluminum, stainless steel, and titanium to produce structural components, primarily for the aerospace industry (notably Boeing and Northrup). It is a large facility, employing 185 people, and has operated at that site for about 35 years. Claudia and I conducted a full CEI and made walk-throughs of each of the buildings and the peripheral lots.

Solid wastes generated by GM include (1) water-soluble oils (Hangsterfer HE-2"), which is used as the lubricant for their metal milling process, (2) Speedy Dry, used to clean machines and spills of the lubricants; (3) aluminum scraps; (4) lubricant-soaked rags; and (5) trichloroethylene, from their vapor degreaser. All of these wastes are managed by Safety-Kleen. After a review of MSD sheets, analytical results, and similar material survey and manifest documents (and from observations), it was determined that only the trichloroethylene waste is a RCRA hazardous waste, and only approximately 16 gallons is generated and manifested per month by GM. Except for three 5-gallon unlabeled containers, located in their outdoor drummed storage area and stated to contain waste automobile fluids (GM allows employees to placed such waste there), no concerns were noted at the GM site.

The 55-gallon drums which were seen as being haphazardly placed in a small lot between GM and the Circuitron Superfund site were empty (I tested most of them), and almost all had contained the Hangsterfer lubricant. The facility stated that they recently hired a contractor to manage materials in this lot (including aluminum scraps contained in a large roll-off). Therefore, we conclude that GM is a CESQG, and, if it is the source of the VOCs noted in Carl's message, it would have to have been an historic event.

The WD Equities site on Verdi is now Phase II Pasta Machines Inc. and is not associated with GM in any capacity. This site conducts small-scale milling of aluminum and plastic to manufacturer pasta machines; lubricants used is a green non-hazardous soapy material. No hazardous waste is generated at this site. The owner did discuss the clean-up of this site (including the removal of two 1,000 gallon USTs) as part of the arrangements with his mortgage company to purchase the property three years ago. No concerns whatsoever were noted at this site.

Claudia is preparing the reports for these sites.

CC: GUTIERREZ-CLAUDIA